

## **ATTACHMENT “B”-STATEMENT OF BASIS**

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT PERMIT No. F-01-040

PPROMOTIONAL WOOD PRODUCTS, LLC  
10051 BELLWOOD ROAD, BOSTON, KENTUCY

NOVEMBER 12, 2001

FROUGH SHERWANI, REVIEWER

PLANT I.D. # 021-179-00055

APPLICATION LOG # 54204

**SOURCE DESCRIPTION:**

The Promotional Wood Products, LLC is located at Boston, Kentucky, manufactures wooden novelty boxes for liquor industry. The source is proposing a new product line called keepsake boxes.

The source is currently classified as “No Permit Required”. The source has applied for conditional major under 401 KAR 52: 030

<b>Emission Point</b>	<b>01</b>	<b>Spray Booth # 01</b>
	<b>MP1</b>	Manual Spray Gun

This point is for spray gun. The “PTE” is based on 28.13 gallons per hour. The assumed transfer efficiency of the system is 60%. Booth has fabric filter to control particulate matter. The control efficiency of the filter is 90%. The “PTE” is based on 380 hrs per year due to the batch process.

<b>Emission Point</b>	<b>02</b>	<b>Spray Booth # 03</b>
	<b>MP1</b>	Manual Spray Gun

This point is for spray gun. The “PTE” is based on 28.13 gallons per hour. The assumed transfer efficiency of the system is 60%. Booth has fabric filter to control particulate matter. The control efficiency of the filter is 90%. The “PTE” is based on 380 hrs per year due to the batch process.

<b>Emission Point</b>	<b>03</b>	<b>Spray Booth # 2</b>
	<b>MP1</b>	Automated Spray Gun

This point is for spray gun. The “PTE” is based on 3.0 gallons per hour. The assumed transfer efficiency of the system is 60%. Booth has fabric filter to control particulate matter. The control efficiency of the filter is 90%. The “PTE” is based on 1140 hrs per year due to the batch process. This is proposed emission point.

<b>Emission Point</b>	<b>04</b>	<b>Spray Booth # 4</b>
	<b>MP1</b>	Automated Spray Gun

This point is for spray gun. The “PTE” is based on 6.0 gallons per hour. The assumed transfer efficiency of the system is 60%. Booth has fabric filter to control particulate matter. The control efficiency of the filter is 90%. The “PTE” is based on 1140 hrs per year due to the batch process. This is proposed emission point.

<b>Emission Point</b>	<b>05</b>	<b>Misc. Wood Working</b>
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This point is for miscellaneous wood working operations. The consumption of wood for this process is 0.3 tons. per hour. The woodworking process has baghouse to control particulate matter. The efficiency of the control unit is 80%.

#### **COMMENTS:**

#### **Type of control and efficiency:**

Emission point 01 to 04 has fabric filter to control particulate matter. The control efficiency of the filter is 90%. Emission point 05 has baghouse to control particulate matter. The control efficiency of the baghouse is 80%.

#### **Emission factors and their source:**

AP –42 5<sup>th</sup> edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

**Applicable regulation:**

State regulation 401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The actual emissions of HAPS for a single pollutant shall not exceed 9.0 tons per year. The combined emissions for HAPs shall not exceed 22.5 tons per year. The actual VOC emissions shall not exceed 90.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.